

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

GESPA NICARAGUA, S.A.

*Plaintiff,*

v.

INABATA EUROPE GMBH;  
RECOM AG; FLEXTRONICS  
INTERNATIONAL USA, INC.,;  
FLEXTRONICS AUTOMOTIVE USA, LLC;  
and MKG GMBH MONTAGEBAU KARL  
GOEBEL,


*Defendants.*

CIVIL ACTION NO. 3:17-CV-00306 PRM

**DECLARATION AND VERIFICATION IN SUPPORT OF DEFENDANT,  
MKG GMBH MONTAGEBAU KARL GOEBEL'S, MOTION TO DISMISS FOR LACK  
OF SUBJECT MATTER JURISDICTION AND LACK OF PERSONAL JURISDICTION**

Defendant, MKG GMBH MONTAGEBAU KARL GOEBEL, (“MKG”) by and through its attorney of record, submits this Declaration and Verification supporting its Motion to Dismiss for Lack of Subject Matter Jurisdiction and Lack of Personal Jurisdiction.

1. My name is Falko Schrade. I am the Chief Executive Officer (*Geschaeftsfuehrer*) of MKG. I am over 18 years of age, of sound mind, and capable of making this affidavit.
2. MKG is a Defendant in the above-referenced cause filed in United States District Court for the Western District of Texas, El Paso Division. The facts stated in this affidavit are within my personal knowledge as the Chief Executive Officer (*Geschaeftsfuehrer*) of MKG and are true and correct.
3. MKG is a company with limited liability (*Gesellschaft mit beschraenkter Haftung/ GmbH*) duly incorporated in the Federal Republic of Germany. MKG's headquarters are located in Oehringen, Baden-Wuerttemberg, Federal Republic of Germany.



4. MKG does not now and has never conducted business in the State of Texas. MKG does not direct any advertising activities to the State of Texas and has never done so. MKG does not now and has never solicited business in the State of Texas.
5. MKG does not design products or services specifically for the Texas marketplace.
6. MKG does not now and has never had any employees or agents in the State of Texas.
7. MKG does not now and has never had any offices in the State of Texas.
8. MKG does not now and has never owned real property in the State of Texas.
9. No officer or director of MKG is a citizen, resident or domiciliary of the State of Texas and none own real estate in the State of Texas.
10. All of the alleged acts and omissions of MKG related to this lawsuit took place outside of the State of Texas.

I declare under penalty of perjury under the laws of the United States of America that I have read the foregoing sworn statement pursuant to 28 U.S.C. § 1746 and that the foregoing is true and correct.

Executed on January 18<sup>th</sup>, 2018.



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Falko Schrade  
Chief Executive Officer (*Geschäftsfuehrer*)  
MKG GmbH Montagebau Karl Goebel